

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA
Philadelphia Division**

Michelle May,

Debtor.

Case No. 24-14125-AMC
Chapter 13

Motion to Extend the Automatic Stay

Debtor Michelle May, through their attorney, moves this Court as follows:

1. The Debtor filed a bankruptcy petition on November 18, 2024. They have filed a plan and all schedules, statements, and other documents required by 11 U.S.C. §521(a)(1) and Fed. R. Bankr. P. 1007(b).
2. The Debtor was involved in one active bankruptcy between November 19, 2023, and November 18, 2024:

Case No.	District	Filed	Dismissed	Reason
24-13318	PAEB	09/18/2024	10/09/2024	Failure to file documents

3. Because the Debtor was involved in only one active bankruptcy between November 19, 2023, and November 18, 2024, the automatic stay is set to expire on December 18, 2024. 11 U.S.C. § 362(c)(3)(A).

4. The Court may extend the automatic stay when a case is filed in good faith as to the creditors to be stayed. Good faith means that there are new circumstances demonstrating that the Debtor can probably reach the end of a chapter 13 plan. *In re Legree*, 285 B.R. 615, 620 (Bankr. E.D. Pa. 2002).


5. This case was filed in good faith. The debtor filed a plan and all schedules, statements, and other documents required by 11 U.S.C. § 521(a)(1) and Fed. R. Bankr. P. 1007(b) with the voluntary petition.

6. Because this case was filed in good faith, the Court must continue the automatic stay against all creditors until the Debtor receive a discharge.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: November 18, 2024

CIBIK LAW, P.C.
Counsel for Debtor

By: 

Michael A. Cibik (#23110)
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
215-735-1060
mail@cibiklaw.com